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*Attorneys for The Official Committee of the  
Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re

THE ROMAN CATHOLIC ARCHBISHOP  
OF SAN FRANCISCO,

Debtor.

Case No. 23-30564 (DM)

Chapter 11

Adv No. 25-03019 (DM)

The Roman Catholic Archbishop of San  
Francisco,

Plaintiff,

v.

John DB Roe SF, *et al.*,

Defendants.

**STIPULATION PERMITTING THE  
OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS TO  
INTERVENE**

[No Hearing Requested]

The Roman Catholic Archbishop of San Francisco (“Plaintiff” or “Debtor”) and the  
Official Committee of Unsecured Creditors of the Debtor (the “Committee”) (collectively, the  
“Parties”), by and through their undersigned attorneys, hereby stipulate:

WHEREAS, Plaintiff filed a voluntary petition under chapter 11 of the Bankruptcy Code  
and is the debtor and debtor in possession in the above-captioned case.

WHEREAS, the Office of the United States Trustee appointed the Committee. The  
Committee consists of nine individuals who filed claims alleging they were minors who were  
sexually abused by perpetrators for whom the Debtor was responsible. *See* Docket No. 58.

1 WHEREAS, on April 28, 2025, Plaintiff commenced the above-referenced adversary  
2 proceeding (the “Adversary Proceeding”) by filing its *Complaint Seeking Declaratory and*  
3 *Injunctive Relief Under Bankruptcy Code Sections 105(A) and 362 that the Automatic Stay Extends*  
4 *to All State Court Cases in Which Debtor Is Named as a Defendant and as to All Cases in Which a*  
5 *Non-Debtor Affiliate Is Named as a Defendant* [Adv. Docket No. 1] (the “Complaint”) against  
6 certain individuals.

7 WHEREAS, the Committee has requested that it be permitted to appear, be heard, and  
8 intervene in the Adversary Proceeding.

9 WHEREAS, Plaintiff does not oppose the Committee’s intervention in the Adversary  
10 Proceeding.

11 WHEREAS, the Parties contend that the Committee’s intervention in the Adversary  
12 Proceeding will not unduly delay or prejudice the adjudication of the original parties’ rights  
13 since, among other things, the time for answering the Complaint has not expired.

14 **NOW, THEREFORE,** the Parties hereby stipulate and agree as follows:

15 1. Pursuant to 11 U.S.C. § 1109(b) and Federal Rule of Bankruptcy Procedure 7024,  
16 the Committee shall be permitted to appear, be heard, and intervene in the Adversary Proceeding  
17 for all purposes (including to take discovery pursuant to the Federal Rules of Bankruptcy  
18 Procedure); provided however that the Committee shall not be required to respond to the  
19 Complaint.

20  
21 Dated: May 28, 2025

**PACHULSKI STANG ZIEHL & JONES LLP**

22  
23 By /s/ Gail S. Greenwood

24 James I. Stang  
25 Brittany M. Michael  
26 Gail S. Greenwood

27 Attorneys for the Official Committee of  
28 Unsecured Creditors

1 Dated: May 29, 2025

**FELDERSTEIN FITZGERALD WILLOUGHBY  
PASCUZZI & RIOS LLP**

2  
3 By /s/ Paul Pascuzzi

4 Paul Pascuzzi

5 Jason E. Rios

6 Thomas Phinney

7 -and-

**SHEPPARD MULLIN RICHTER & HAMPTON  
LLP**

8  
9 By /s/ Ori Katz

10 Ori Katz

11 Alan H. Martin

12 Jeannie Kim

13 Attorneys for The Roman Catholic Archbishop of  
14 San Francisco